



The TAG is concerned about EPA's use of visible vermiculite as a clean-up standard and as a trigger for additional investigation/remediation.

**Question: Will visible vermiculite be covered or removed as part of the remedy and will visible vermiculite be covered or removed as it is discovered on OU1?**

Because of the limited activity-based sampling (ABS) performed at OU1 and 2, the TAG is concerned that the selected remedy will not break all exposure pathways. As example, EPA stated: "Note that all individuals who visit the OU by car might be exposed by transfer of contaminated soil from the OU into the car, followed by subsequent inhalation exposure while driving. The significance of this exposure pathway is currently unknown, but may be investigated in the future to support evaluation of cumulative Libby site-wide risk".

**Question: Will all potential pathways of exposure be assessed as part of the ABS at OU1 after construction is complete and toxicity values are available to confirm effectiveness of the remedy.**

Estimated excess cancer risks to people who work or visit OU1 are stated to be below or within EPA's risk range. However, these people may be exposed to LA by other pathways, and so risk evaluations must consider the total risk. While this ROD focuses exclusively on exposures and risks that occur within OU1, the contributions of risks from OU1 to total (cumulative) site-wide risk will be addressed in the future.

**Question: Since it is probable that exposures to LA will occur outside of OU1, is EPA considering these additional exposures in its remedy for OU1?**

The TAG is concerned that EPA's ambient air quality monitoring may not be representative of ambient air quality associated with OU1.

**Questions: Will EPA establish an ambient air quality station specific to OU1? Will ambient air quality be assessed during construction of the remedy? Is risk associated with short fibers (< 5um) being addressed in the current ambient air monitoring?**

The TAG is requesting to have Institutional Controls (ICs) specified in as much detail as possible in the remedial design.

**Question: Will long term ambient air monitoring be included as part of the ICs to sampling to verify the effectiveness of remedy and ensure protection of public health? In addition, is EPA considering utilizing personal air monitors in OU1 on maintenance workers?**